

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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|--------------------------|---|------------------------------|
| UNITED STATES OF AMERICA |) | |
| |) | |
| v. |) | Criminal No: 21-cr-10015-FDS |
| |) | |
| JOHNATHAN TAYLOR, |) | |
| Defendant. |) | |

JOINT STATUS REPORT

Pursuant to Local Rule 116.5(b), the parties hereby file the following status report prepared in connection with the status conference scheduled for August 10, 2021. In light of the following information, the parties request that the hearing be canceled.

- (1) Automatic Discovery/Pending Discovery Requests
The government has provided automatic discovery. The defendant is in the process of reviewing these discovery materials. He will consult with defense counsel regarding any potential additional requests.
- (2) Additional Discovery
Defense counsel requests additional time to confer with the government in order to schedule a convenient time to review contraband discovery materials (i.e., digital evidence that cannot be provided to the defense) at the HSI lab. Defense counsel would then intend to discuss his review of these materials with the defendant.
- (3) Timing of Additional Discovery Requests
Defense counsel has not yet determined whether he will make additional discovery requests.
- (4) Protective Orders
The Court has issued a protective order related to the production of sensitive discovery materials. The parties do not, at this time, anticipate the need for entry of additional protective orders.
- (5) Pretrial Motions
It is premature to decide whether the Defendant will file any pretrial motions under Fed. R. Crim. P. 12(b).

(6) Expert Discovery

The Government agrees to provide any expert witness disclosures 21 days prior to trial. The Defendant agrees to provide any expert witness disclosures 14 days prior to trial.

(7) Defenses of Insanity, Public Authority, or Alibi

The defendant reserves the right to raise a defense of insanity, public authority, or alibi.

(8) Speedy Trial Act

All of the time has been excluded from the defendant's initial appearance through the date of the interim status conference scheduled for August 10, 2021. The parties request that the time be excluded until the final status conference, pursuant to 18 U.S.C. § 3161(h)(7)(A).

(9) Status of Plea Negotiations and Likelihood of Trial

The parties expect to engage in discussions regarding potential resolution of the following the completion of the forensic evaluation referenced below. If the case were to proceed to trial, the parties estimate that it can be tried in one week.

(10) Scheduling of Further or Final Status Conference

Due to logistical issues related to the ongoing pandemic, defense counsel requires additional time to complete a forensic psychological evaluation involving the defendant. Counsel anticipates that an additional 30-45 days would be sufficient to complete the process.

Given all of the foregoing information, the parties request that the status conference, scheduled for August 10, 2021, be canceled. The parties request a final status conference in approximately 30-45 days.

Respectfully submitted,

NATHANIEL R. MENDELL
Acting United States Attorney

/s/ Oscar Cruz
Oscar Cruz
Assistant Federal Public Defender

By: /s/ Anne Paruti
Anne Paruti
Assistant U.S. Attorney

Dated: August 9, 2021

CERTIFICATE OF SERVICE

This is to certify that I have this day served a copy of the foregoing upon all counsel of record by electronic filing notice.

/s/ Anne Paruti
Assistant U.S. Attorney

Dated: August 9, 2021